

# ZEMAN & WOMBLE, LLP

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MEMO ENDORSED

May 8, 2020

5/8/20

Mr. Womble is reappointed  
nunc pro tunc to April 1, 2020,  
to represent defendant in  
connection with his motion to  
compassionate release.

Billie McNeil

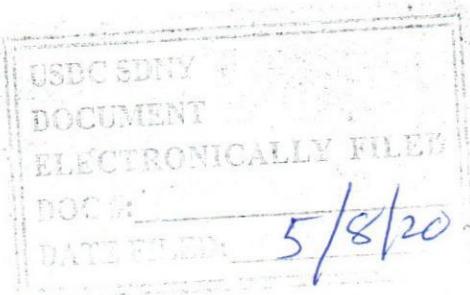
BY ECF & FAX  
Hon. Colleen McMahon  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: *United States v. Jacinto Garcia*  
18 Cr. 802 (CM)

Dear Chief Judge McMahon:

As you are aware at this point, I represented Jacinto Garcia in the above-referenced matter pursuant to Criminal Justice Act 18 U.S.C. §3006A, from the inception of his case through sentencing. I recently filed a post-sentencing motion for Compassionate Release (see Dkt. # ) as well as a Reply to the Government's Response (see Dkt. # ). Prior to filing the motion for Compassionate Release, on April 2, 2020, I submitted a petition directly to the Warden of FCI Fort Dix asking for Mr. Garcia to be granted compassionate release. I respectfully request the Court reappoint me, nunc pro tunc, from April 1, 2020, the date I began working on the issues related to the request for Compassionate Release on Mr. Garcia's behalf.

Thank you for your consideration of this request.



Sincerely,

/s/ Ken Womble

Ken Womble  
Zeman & Womble, LLP  
Counsel for Jacinto Garcia